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August 14, 2007

Hon. George B. Daniels
United States District Judge
United States Courthouse
500 Pearl Street, Room 630
New York, N.Y. 10007Re: Alexander v. Amchem Products, Inc., et al.,
Case No. 07 CV 6441 (GBD)

Dear Judge Daniels:

Having received today the Notice of Reassignment of the above-referenced case to Your Honor, Plaintiffs John Alexander and Braulia Alexander respectfully submit this letter to alert the Court that on or about July 31, 2007, when this case was assigned to the Hon. P. Kevin Castel, Plaintiffs served and filed a motion pursuant to 28 U.S.C. §1447 to remand this case to New York State Supreme Court where it was originally filed as part of the consolidated In re New York City Asbestos Litigation, Index No. 40000/88 (Sup. Ct. N.Y. Co.). Please find enclosed courtesy copies of Plaintiffs' Notice of Motion To Remand, Plaintiffs' Affirmation In Support of Their Motion To Remand, and Plaintiffs' Memorandum of Law In Support Of Their Motion To Remand the Case To State Court.

As explained in more detail in Plaintiffs' motion papers, because Mr. Alexander is dying from cancer alleged to be caused by asbestos exposures by defendants, his case had been placed on the In Extremis docket of the New York City Asbestos Litigation, and Plaintiffs' trial recently been scheduled to commence in early October 2007, when this case was removed by Defendants Ford Motor Company and General Motors Corporation last month on the asserted ground of fraudulent joinder of defendants. Since Plaintiffs' trial

date obviously is jeopardized by this removal, and various pretrial discovery and motion practice scheduled for this summer by the trial judge in the court below has been stayed, Plaintiffs respectfully request that an expedited briefing schedule and oral argument for their remand motion be set as soon as possible.

Respectfully submitted,

WEITZ & LUXENBERG, P.C.

Attorneys for Plaintiffs John Alexander
and Braulia Alexander

By: 

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Encls.

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